

Exhibit 23

5. Attached to the Motion as Exhibit 4 is a true and correct copy of the Report of Findings, Product Defect Analysis by Beau A. Biller, M. Eng., P.E., ACTAR, dated November 5, 2024.

6. Attached to the Motion as Exhibit 5 is a true and correct copy of the Rule 26(a)(2)(B) Declaration of Benjamin D. Gatrost, dated November 5, 2024.

7. Attached to the Motion as Exhibit 6 is a true and correct copy of the “Sig Sauer – Striker Fired Pistol” design overview that was produced by Sig Sauer in this litigation, Bates. Nos. P320Design000001–04.

8. Attached to the Motion as Exhibit 7 is a true and correct copy of the United States Government Accountability Office’s (GAO) denial of Sig Sauer, Inc.’s appeal concerning the rejection of its firearms proposal, obtained from a publicly available source, and dated July 23, 2010.

9. Attached to the Motion as Exhibit 8 is a true and correct copy of the Transcript of Jury Trial Proceedings, testimony of Sean Toner, obtained from a publicly available source, dated June 12, 2024.

10. Attached to the Motion as Exhibit 9 is a true and correct copy of an email from Sean Toner dated June 5, 2014 that was produced by Sig Sauer in this litigation, Bates No. P320Design000040.

11. Attached to the Motion as Exhibit 10 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Sig Sauer, Inc., via Thomas Taylor, dated September 12, 2024

12. Attached to the Motion as Exhibit 11 is a true and correct copy of the Expert Report of Edward M. Stockton, dated November 5, 2024.

13. Attached to the Motion as Exhibit 12 is a true and correct copy of a P320 product catalogue that was produced by Sig Sauer in this litigation, Bates Nos. SIG-GLASSCOCK00001727–65.

14. Attached to the Motion as Exhibit 13 is a true and correct copy of an electronically printed version of a native excel spreadsheet produced by Sig Sauer in this litigation, titled “MHS Pistol Failure Modes, Effects, and Criticality Analysis (FMECA),” original Bates No. SIG-ARMY 00000414.

15. Attached to the Motion as Exhibit 14 is a true and correct copy of a document titled “Failure Modes, Effects and Criticality Analysis (FMECA),” dated February 16, 2017, that was produced by Sig Sauer in this litigation, Bates Nos. SIG-ARMY 00000412–13.

16. Attached to the Motion as Exhibit 15 is a true and correct copy of a document titled “PURCHASE DESCRIPTION / MODULAR HANDGUN,” dated December 17, 2015, that was produced by Sig Sauer in this litigation, Bates Nos. SIG-ARMY 000001–125.

17. Attached to the Motion as Exhibit 16 is a true and correct copy of and email, dated July 27, 2021, from Samantha Piatt, including an attachment, that was produced by Sig Sauer in this litigation, Bates Nos. SIG-GLASSCOCK00000183–85.

18. Attached to the Motion as Exhibit 17 is a true and correct copy of an email from Tom Taylor, dated April 13, 2023, including attachments, that was produced by Sig Sauer in this litigation, Bates Nos. SIG-GLASSCOCK00000228–35.

19. Attached to the Motion as Exhibit 18 is a true and correct copy of an article published by the Washington Post, titled *Popular handgun fires without anyone pulling the trigger, victims say*, by Champe Barton and Tom Jackman, dated April 11, 2023, publicly available at

<https://www.washingtonpost.com/dc-md-va/2023/04/11/victims-say-sig-sauer-p320-fires-on-own/>.

20. Attached to the Motion as Exhibit 19 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Sig Sauer, Inc., via Christopher Meyer, dated September 11, 2024

21. Attached to the Motion as Exhibit 20 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Sig Sauer, Inc., via Matt Farkas, dated September 23, 2024

22. Attached to the Motion as Exhibit 21 is a true and correct copy of a memorandum issued by the Washington State Criminal Justice Training Commission, dated October 17, 2024, delivered via email from Jerrel Wills, the Deputy Director of the Washing State Criminal Justice Training Commission.

23. Attached to the Motion as Exhibit 22 is a true and correct copy of a Sig Sauer P320 advertisement that was produced by Sig Sauer in this litigation, Bates No. SIG-MARKETING-000253.

24. Attached to the Motion as Exhibit 24 is a true and correct copy of the Verdict Form from *Lang v. Sig Sauer, Inc.*, No. 21-CV-4196 (June 20, 2024) ECF No. 131.

25. Attached to the Motion as Exhibit 25 is a true and correct copy of a Sig Sauer P320 advertisement that was produced by Sig Sauer in this litigation, Bates No. SIG-MARKETING-000033.

26. Attached to the Motion as Exhibit 26 is a true and correct copy of a Sig Sauer P320 advertisement that was produced by Sig Sauer in this litigation, Bates No. SIG-MARKETING-000051.

27. Attached to the Motion as Exhibit 27 is a true and correct copy of a Sig Sauer P320 advertisement that was produced by Sig Sauer in this litigation, Bates No. SIG-MARKETING-000088.

28. Attached to the Motion as Exhibit 28 is a true and correct copy of the Declaration of Carla A. Peak from Verita Global Regarding Proposed Class Certification Notice Plan dated November 5, 2024, including its exhibit.

29. I have also prepared a draft notice to be delivered to class members upon certification, which is attached to the Motion as Exhibit 29

30. To date, Plaintiff Joshua Glasscock has participated actively in discovery, including sitting for a deposition, answering interrogatories, and gathering and producing documents.

31. I have extensive experience in handling matters related to consumer protection, including prosecuting similar cases via the class action device.

32. This experience includes being co-lead class counsel in *Burnett v. National Association of Realtors* (W.D. Mo.), where our trial team secured a \$1.7 billion dollar jury verdict in a class action for antitrust claims brought on behalf of Missouri consumers, and whereby an MMPA class was certified on behalf of Missouri consumers.

33. Additionally, our firm has a track record of successfully litigating claims in the U.S. District Court for the Western District of Missouri in cases such as: *Smith, et al., v. Atkins Nutritionals Inc.*, Case No. 2:18-cv-04004-MDH; *Hays v. Nissan*, Case No. 4:17-cv-00353-BCW; and *Woods v. CVS-Caremark*, Case No. 4:14-cv-00583-SRB.

34. Mine, my firm's, and my co-counsel's extensive qualifications to handle this litigation are explained in more detail in the firm resumes of Williams Dirks Dameron LLC and Lear Werts LLP, which are attached to the Motion as Exhibits 30-31.

35. Upon investigation, the following 32 cases were determined to have been filed against Sig Sauer, alleging harm due to an inadvertent discharge of the P320:

Personal Injury Suits Against Sig Sauer Concerning P320				
Case Name¹	Law Enforcement Plaintiff	Jurisdiction	Case No.	Date Filed
<i>Vadnais v. Sig Sauer*</i>	Sheriff	E.D. Va.	18-CV-540	May 4, 2018
<i>Mayes v. Sig Sauer*</i>	Former law enforcement	W.D. Ky.	19-CV-146	Oct. 16, 2019
<i>Frankenberry v. Sig Sauer*</i>	Former Police Officer	D. S.C.	19-CV-2990	Oct. 22, 2019
<i>Jinn v. Sig Sauer*</i>	Homeland Security Special Agent	S.D.N.Y.	20-CV-1122	Feb. 10, 2020
<i>Hoefs v. Sig Sauer*</i>	x	W.D. Wash.	20-CV-5173	Feb. 26, 2020
<i>Williams v. Sig Sauer*</i>	x	E.D. Ky.	20-CV-78	May 22, 2020
<i>Guay v. Sig Sauer*</i>	x	D. N.H.	20-CV-736	July 2, 2020
<i>Powers v. Sig Sauer*</i>	Former U.S. Sergeant	M.D. Fla.	20-CV-2026	Aug. 28, 2020
<i>Haynes v. Sig Sauer*</i>	Police Officer	N.D. Ga.	20-CV-4218	Oct. 13, 2020
<i>Schneider v. Sig Sauer*</i>	x	D. N.H.	20-CV-1190	Dec. 18, 2020
<i>Watson v. Sig Sauer*</i>	x	N.D. Tex.	21-CV-106	Jan. 29, 2021
<i>Slatowski v. Sig Sauer*</i>	Deportation Officer with ICE	E.D. Pa.	21-CV-729	Feb. 17, 2021
<i>Campbell v. Sig Sauer*</i>		W.D. Mo.	21-CV-5047	May 19, 2021
<i>Ahern v. Sig Sauer</i>	Detective Lieutenant	D. Mass.	21-CV-11007	June 16, 2021
<i>Hilton v. Sig Sauer*</i>	Detective	E.D. Tex.	21-CV-441	Aug. 16, 2021
<i>Collette v. Sig Sauer*</i>	Police Officer	D. Mass.	21-CV-11392	Aug. 25, 2021
<i>Lang v. Sig Sauer*</i>	x	N.D. Ga.	21-CV-4196	Oct. 11, 2021
<i>Herman v. Sig Sauer*</i>	x	W.D. Okla.	21-CV-1038	Oct. 25, 2021
<i>Colwell v. Sig Sauer*</i>	Police Officer	N.D.N.Y.	21-CV-1200	Nov. 2, 2021
<i>Green-Berrios v. Sig Sauer</i>	Police Officer	D. P.R.	22-CV-1002	Jan. 4, 2022
<i>Davis v. Sig Sauer*</i>		E.D. Ky.	22-CV-10	Feb. 1, 2022
<i>Catatao v. Sig Sauer</i>	Police Officer	D. Mass.	22-CV-10620	April 26, 2022
<i>White v. Sig Sauer*</i>	Police Officer	N.D. Ga.	22-CV-1985	May 18, 2022
<i>Williams v. Sig Sauer</i>	x	E.D. N.C.	22-CV-48	May 18, 2022
<i>Winingham v. Sig Sauer*</i>	x	D. Ariz.	22-CV-1037	June 16, 2022

¹ Case names denoted with an “*” are no longer pending in the district court.

<i>Desrosiers v. Sig Sauer</i>	Police Officer	D. Mass	22-CV-11674	Oct. 3, 2022
<i>Valentino v. Sig Sauer*</i>	Special Agent, Homeland Security	D. N.J.	23-CV-1309	March 8, 2023
<i>Hall v. Sig Sauer</i>	Police Officer	M.D. Pa.	23-CV-978	June 13, 2023
<i>Cole v. Sig Sauer</i>	Sheriff	D. Maine	23-CV-327	Aug. 23, 2023
<i>Jantz v. Sig Sauer</i>	x	D. Colo.	24-CV-15	Jan. 3, 2024
<i>Barmore v. Sig Sauer*</i>	Police Officer	W.D. Lou.	24-CV-56	Jan. 16, 2024
<i>Torres v. Sig Sauer</i>	Police Officer	D. P.R.	24-CV-1441	Sept. 20, 2024

Executed in Kansas City, Missouri
this 5th day of November 2024

/s/ Matthew L. Dameron
Matthew L. Dameron